

EXHIBIT 29

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 - - -
5

6 IN RE: NATIONAL : HON. DAN A.
7 PRESCRIPTION OPIATE : POLSTER
8 LITIGATION :
9 :
10 APPLIES TO ALL CASES : NO.
11 : 1:17-MD-2804
12 :
13

14 - HIGHLY CONFIDENTIAL -
15

16 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW
17

18 VOLUME I
19 - - -
20

21 April 17, 2019
22 - - -
23

24 Videotaped deposition of
25 THOMAS PREVOZNIK, taken pursuant to
26 notice, was held at the law offices of
27 Williams & Connolly, 725 12th Street,
28 Washington, D.C., beginning at 9:11 a.m.,
29 on the above date, before Michelle L.
30 Gray, a Registered Professional Reporter,
31 Certified Shorthand Reporter, Certified
32 Realtime Reporter, and Notary Public.
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34

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16 (Via telephone)

(Motley Rice)

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18 VIDEOTAPE TECHNICIAN:

Chris Ritona

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2 THE VIDEOGRAPHER: We are
3 now on the record. My name is
4 Chris Ritona. I am the
5 videographer with Golkow
6 Litigation Services.

7 Today's date is April 17,
8 2019, and the time is
9 approximately 9:11 a.m.

10 This video deposition is
11 being held at Williams & Connolly,
12 LLP, 725 12th Street Northwest,
13 Washington, DC, in the matter of
14 National Prescription Opiate
15 Litigation, MDL No. 2804, case
16 Number 17-MD-2804, for the United
17 States District Court, Northern
18 District of Ohio, Eastern
19 Division.

20 The deponent today is Thomas
21 Prevoznik. And all counsel will
22 be noted upon the stenographic
23 record.

24 The court reporter today is

1 Michelle Gray, and she will now
2 please swear in the witness.

3 - - -

4 ... THOMAS PREVOZNIK, having
5 been first duly sworn, was
6 examined and testified as follows:

7 - - -

8 EXAMINATION

9 - - -

10 BY MS. MAINIGI:

11 Q. Good morning, Mr. Prevoznik.

12 A. Good morning.

13 Q. I will begin the
14 questioning. My name is Enu Mainigi, and
15 I'm going to begin the questioning on
16 behalf of the defendants, and then there
17 are other defendants that may question
18 you after I'm done, and then the
19 plaintiffs will question you thereafter.

20 Mr. Prevoznik, I have put in
21 front of you Exhibit 1. And Exhibit 1 is
22 the notice of deposition.

23 (Document marked for
24 identification as Exhibit

1 that we will go out and inspect their
2 facility, their registration.

3 Q. And is that inspection or
4 visit different from what might be
5 referred to as a DEA audit or are they --

6 A. They're the same.

7 Q. The same. Got it.

8 And during a scheduled
9 investigation or audit, does the DEA
10 review a registrant's written policies?

11 A. Their protocols?

12 Q. Yes.

13 A. Yes.

14 Q. And if the DEA has concerns
15 about those policies, does it raise those
16 concerns with the registrant?

17 MS. SINGER: Objection.

18 Calls for speculation.

19 THE WITNESS: To my -- yes,
20 they do.


21 BY MR. O'CONNOR:

22 Q. Does DEA make -- make
23 determinations about whether particular
24 orders are suspicious if they are asked

1
2 CERTIFICATE
3
4

5 I HEREBY CERTIFY that the
6 witness was duly sworn by me and that the
7 deposition is a true record of the
8 testimony given by the witness.

9 It was requested before
10 completion of the deposition that the
11 witness, THOMAS PREVOZNIK, have the
12 opportunity to read and sign the
13 deposition transcript.

14 
15 MICHELLE L. GRAY,
16 A Registered Professional
17 Reporter, Certified Shorthand
18 Reporter, Certified Realtime
19 Reporter and Notary Public
20 Dated: April 22, 2019
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23
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25 (The foregoing certification
26 of this transcript does not apply to any
27 reproduction of the same by any means,
28 unless under the direct control and/or
29 supervision of the certifying reporter.)
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